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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
Min Kyong SHIN-Sanchez  
  
Defendant.

**'08 MJ 87 46**  
Magistrate Case No.:  
COMPLAINT FOR VIOLATION OF  
21 U.S.C. § 952 and 960  
Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

That on or about August 19, 2008, within the Southern District of California, defendant Min Kyong SHIN Sanchez, did knowingly and intentionally import approximately 52.68 kilograms (115.89 pounds) of marijuana, a Schedule I Controlled substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Special Agent  
Immigration and Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE THIS 20th  
DAY OF AUGUST, 2008.

  
Peter C. Lewis  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Min Kyong SHIN Sanchez

4 STATEMENT OF FACTS

5 This complaint is based on the personal observations,  
6 investigation, and information furnished to U. S. Immigration and  
7 Customs Enforcement Special Agent Christina Johnson.

8 On August 19, 2008, at approximately 2300 hours, Min Kyong  
9 SHIN-Sanchez (SHIN) entered the United States from the Republic  
10 of Mexico at the Calexico, California, West Port of Entry. SHIN  
11 was the driver of a blue 2001 Ford Windstar bearing California  
12 license plate 6DWW155.

13 Primary Customs and Border Protection (CBP) Officer A.  
14 Moreno received a negative Customs declaration from SHIN. SHIN  
15 presented her valid U. S. passport. CBP Officer Moreno inquired  
16 about the purpose of her trip into Mexico. SHIN stated she went  
17 to visit relatives. CBP Officer Moreno conducted an examination  
18 of the vehicle and noticed a discrepancy in the floor level of  
19 the vehicle. CBP Officer Pelayo noticed the discrepancy in the  
20 floor of the vehicle. Border Patrol Dog Handler (BPDH) E.  
21 Mendoza utilized his Narcotics Detector Dog (NDD) to screen the  
22 vehicle. The NDD alerted to the vehicle driven by SHIN. CBP  
23 Officer Moreno escorted SHIN to the Vehicle Secondary Office.  
24 CBP Officer Pelayo drove the vehicle to the secondary lot for  
25 further inspection.

26 In secondary, the CBP Officer Pelayo drilled a hole in the  
27 side of the raised floor compartment and revealed a green leafy  
28 substance. A thorough physical search of the vehicle revealed  
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1 packages concealed in the non-factory floor compartment of the  
2 vehicle. CBP Officer Pelayo removed one package. A presumptive  
3 field test indicated the contents of these packages to be  
4 marijuana. Thirty-four (34) packages were discovered. The total  
5 weight of the packages was approximately 52.68 kilograms (115.89  
6 pounds).

7 SHIN was notified of her arrest and advised of her Miranda  
8 Rights, which she acknowledged and waived. During the interview,  
9 SHIN admitted believing the vehicle contained a controlled  
10 substance. SHIN was to be paid \$2,000.00 for smuggling narcotics  
11 into the United States.  
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